



July 15, 2020

Submitted via FOIAonline (<https://www.foiaonline.gov>)

National FOIA Office
U.S. Environmental Protection Agency
Region 4
1200 Pennsylvania Avenue, N.W. (2310A)
Washington, D.C. 20460

RE: Freedom of Information Act Request and Fee Waiver Request

Dear FOIA Officer:

This request is made pursuant to the Freedom of Information Act, 5 U.S.C. § 552 (“FOIA”), and 40 C.F.R. pt. 2, on behalf of Suncoast Waterkeeper (“SCWK”), Our Children’s Earth Foundation (“OCE”), and Tampa Bay Waterkeeper (“TBWK”) (collectively, “Florida Environmental Nonprofit Organizations”). Consistent with their missions, the Florida Environmental Nonprofit Organizations hereby request copies of the following records¹ from the Environmental Protection Agency (“EPA”):

1. Any and all records relating to the City of Largo’s National Pollution Discharge Elimination System Permit No. FL0026603 (“Largo NPDES Permit”), **dated subsequent to January 1, 2012 that relates to effluent limits in the Largo NPDES Permit for Total Nitrogen and Dichlorobromomethane**, including specifically and without limitation the following actions taken by the Florida Department of Environmental Protection (“FDEP”):
 - a. FL0026603-014-DW1P/RO (Issuance of Permit as revised on June 29, 2020), including EPA’s review and communications regarding the revised equation found in Paragraph 1.A.11, which contains a 30% reduction from the sampling

¹ This request defines “records” broadly to include all documents, books, papers, maps, photographs, machine readable materials, electronic mail messages, or other documentary materials, regardless of physical form or characteristics and any attachments thereto. “Documents,” as used herein, refers to paper documents and/or electronically stored information, including writings, correspondence, emails, records of phone conversations, notes, meeting minutes, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations, stored in any medium.

measurements to calculate Total Nitrogen effluent limits to the wastewater discharge from the permittee's outfall for this facility.

- b. FL0026603-013-DW1P/NR (Issuance of Permit Renewal on February 26, 2019 for five-year period between February 26, 2019 and February 25, 2024)
- c. FL0026603-008-DW1P/RO (Issuance of Permit as revised on October 24, 2014)
- d. FL0026603-007-DW1/NR (Issuance of Permit Renewal on October 26, 2012 for five-year period between October 26, 2012 and October 25, 2017)

This request includes any communications between EPA and FDEP, between EPA and City of Largo, and internal EPA communications regarding City of Largo NPDES Permit applications, renewals, and/or modification processes. These communications include, but are not limited to, the opinions, comments, suggestions, ideas, positions, and/or any statements made by EPA, FDEP, and City of Largo and internal EPA communications regarding the City of Largo NPDES Permits.

- 2. Any and all records relating to Consent Order OGC No. 03-0666 (April 10, 2006) between FDEP and the City of Largo, and all six (6) Amendments to Consent Order OGC No. 03-0666. This request includes, but is not limited to, any communications between EPA and FDEP, between EPA and City of Largo, and internal EPA communications regarding the Consent Order and Amendments. These communications include, but are not limited to, the opinions, comments, suggestions, ideas, positions, and/or any statements stated by EPA, FDEP, and City of Largo and internal EPA communications regarding the Consent Order and Amendments.

Florida Environmental Nonprofit Organizations request all records dated subsequent to the date of this request and before EPA's fulfillment of this FOIA request. Please tender responsive records in digital format whenever possible.

* * *

Please identify and inform us of all responsive or potentially responsive records within the 20 working days as required by FOIA, 5 U.S.C. § 552(a)(6)(A)(i), and the basis of any claimed exemptions, including a description of each specific responsive or potentially responsive records(s) to which such exemption may apply. *See Citizens for Responsibility and Ethics in Wash. v. Federal Election Comm'n*, 711 F.3d 180, 182-83 (D.C. Cir. 2013) (holding that the agency must identify the exemptions it will claim with respect to any withheld documents within the time frame prescribed by FOIA). The Supreme Court has stated that FOIA establishes a "strong presumption in favor of disclosure" of requested information, and that the burden is on the government to substantiate why information may not be released under FOIA's limited exemptions. *Dep't of State v. Ray*, 502 U.S. 164, 173 (1991). Congress affirmed these tenets of FOIA in legislation as recently as December 2007, stating that government remains accessible to the American people and "is always based not upon the 'need to know' but upon the fundamental 'right to know.'" Pub. L. No. 110-175, 121 Stat. 2524, 2525 (Dec. 31, 2007).

If your office takes the position that any portion of the requested records is exempt from disclosure, we request that you provide us with an index of those records as required under *Vaughn v. Rosen*, 484 F.2d 820 (D.C. Cir. 1973), with sufficient specificity “to permit a reasoned judgment as to whether the material is actually exempt under FOIA.” *Founding Church of Scientology v. Bell*, 603 F.2d 945, 959 (D.C. Cir. 1979). A *Vaughn* index must (1) identify each document or portion of document withheld; (2) state the statutory exemption claimed; and (3) explain how disclosure of the document or portion of document would damage the interests protected by the claimed exemption. See *Citizens Comm’n on Human Rights v. FDA*, 45 F.3d 1325, 1326 n.1 (9th Cir. 1995). “The description and explanation the agency offers should reveal as much detail as possible as to the nature of the document,” in order to provide “the requestor with a realistic opportunity to challenge the agency’s decision.” *Oglesby v. U.S. Dep’t of Army*, 79 F.3d 1172, 1176 (D.C. Cir. 1996). Such explanation will be helpful in deciding whether to appeal a decision to withhold documents and may help to avoid unnecessary litigation.

In the event that some portions of the requested records are properly exempt from disclosure, please disclose any reasonably segregable, non-exempt portions of the requested records. See 5 U.S.C. § 552(b). If it is your position that a document contains non-exempt segments and that those non-exempt segments are so dispersed throughout the documents as to make segregation impossible, please state what portion of the document is non-exempt and how the material is dispersed through the document. See *Mead Data Cent. v. U.S. Dep’t of the Air Force*, 455 F.2d 242, 261 (D.C. Cir. 1977). Claims of non-segregability must be made with the same detail as required for claims of exemption in a *Vaughn* index. If a request is denied in whole, please state specifically that it is not reasonable to segregate portions of the record for release.

FOIA requires federal agencies to make their records “promptly available” to any person who makes a proper request for them. 5 U.S.C. § 552(a)(3)(A) (as amended by OPEN Government Act of 2007, Pub. L. No. 110-175, 121 Stat. 2524).

Presumption of Openness and “Foreseeable Harm” Standard

On his first full day in office President Obama demonstrated his commitment to the ideals of transparency and openness by issuing a Memorandum to the heads of all Executive Branch Departments and agencies by calling on them to “renew their commitment to the principles embodied in FOIA.” See Presidential Memorandum for Heads of Executive Departments and Agencies Concerning the FOIA, 74 Fed. Reg. 4683 (Jan. 21, 2009). The President directed all agencies to administer the FOIA with a clear presumption in favor of disclosure, to resolve doubts in favor of openness, and to not withhold information based on “speculative or abstract fears.” *Id.* In addition, the President called on agencies to ensure that requests are responded to in “a spirit of cooperation,” that disclosures are made timely, and that modern technology is used to make information available to the public even before a request is made. *Id.*

In accordance with the President’s directives, on March 19, 2009, Attorney General Holder issued new FOIA guidelines, calling on all agencies to reaffirm the government’s

“commitment to accountability and transparency.” Memorandum from Att’y Gen. Eric Holder for Heads of Executive Departments and Agencies (Mar. 19, 2009), *available at* <http://www.justice.gov/ag/foia-memo-march2009.pdf>. The Guidelines stress that the FOIA is to be administered with the presumption of openness called for by the President. *Id.* at p. 1.

The Attorney General “strongly encourage[d] agencies to make discretionary disclosures of information.” *Id.* He specifically directed agencies not to withhold information simply because they may do so legally and to consider making partial disclosures when full disclosures are not possible. *Id.* He also comprehensively addressed the need for each agency to establish effective systems for improving transparency. *Id.* at p. 2. In doing so he emphasized that “[e]ach agency must be fully accountable for its administration of the FOIA.” *Id.*

In issuing these new guidelines, Attorney General Holder established a new “foreseeable Harm” standard for defending agency decisions to withhold information. Under this new standard, the U.S. Department of Justice will defend an agency’s denial of a FOIA request “only if (1) the agency reasonably foresees that disclosure would harm an interest protected by one of the statutory exemptions, or (2) disclosure is prohibited by law.” *Id.* As a result, “agencies must now include the ‘foreseeable harm’ standard as part of the FOIA analysis at the initial request stage and the administrative appeal stage.” Department of Justice Guide to the FOIA (2009), p. 25, available at http://www.justice.gov/oip/foia_guide09.htm.

This presumption of openness was enshrined in law when Congress passed, and President Obama signed, the FOIA Improvement Act of 2016, Pub. L. No. 114-185, which added a new section to FOIA that states:

- (8)(A) An agency shall –
 - (i) withhold information under this section only if –
 - (I) the agency reasonably foresees that disclosure would harm an interest protected by an exemption described in subsection (b); or
 - (II) disclosure is prohibited by law; and
 - (ii)(I) consider whether partial disclosure of information is possible whenever the agency determines that a full disclosure of a requested record is not possible; and
 - (II) take reasonable steps necessary to segregate and release nonexempt information; and

5 U.S.C. § 552(a)(8).

Request for Fee Waiver

FOIA was designed to grant a broad right of access to government information, with a focus on the public’s “right to be informed about what their government is up to,” thereby “open[ing] agency action to the light of public scrutiny.” *U.S. Dep’t of Justice v. Reporters Comm. for Freedom of Press*, 489 U.S. 749, 773-74 (1989) (internal quotation and citations omitted). A key component of providing public access to those records is FOIA’s fee waiver

provision, 5 U.S.C. § 552(a)(4)(A)(iii), which provides that “[d]ocuments shall be furnished without any charge or at a [reduced] charge . . . if disclosure of the information is in the public interest because it is likely to contribute significantly to public understanding of the operations or activities of the government and is not primarily in the commercial interest of the requester.”

FOIA’s fee waiver requirement is to be “liberally construed.” *Judicial Watch, Inc. v. Rossotti*, 326 F.3d 1309, 1310 (D.C. Cir. 2003); *Forest Guardians v. U.S. Dep’t of the Interior*, 416 F.3d 1173, 1178 (10th Cir. 2005). The fee waiver amendments of 1986 were designed specifically to provide organizations such as Florida Environmental Nonprofit Organizations access to government documents without the payment of fees. As one Senator stated, “[a]gencies should not be allowed to use fees as an offensive weapon against requesters seeking access to Government information . . .” 132 Cong. Rec. S. 14298 (statement of Senator Leahy). Indeed, FOIA’s waiver provision was intended “to prevent government agencies from using high fees to discourage certain types of requesters and requests, in clear reference to requests from journalists, scholars, and . . . non-profit public interest groups.” *Better Gov’t Ass’n v. Dep’t of State*, 780 F.2d 86, 93-94 (D.C. Cir. 1986) (quoting *Ettlinger v. FBI*, 596 F. Supp. 867, 876 (D. Mass. 1984)).

Florida Environmental Nonprofit Organizations, non-commercial requesters, hereby request a waiver of all fees associated with this request because disclosure “is likely to contribute significantly to public understanding of the operations or activities of the government and is not primarily in the commercial interest of the requester.” 5 U.S.C. § 552(a)(4)(A)(iii); *see also* 6 C.F.R. § 5.11(k)(i). This request satisfies both statutory and regulatory requirements for granting a fee waiver, including fees for search, review, and duplication.² Below, stated first in bold, are the criteria considered by FEMA under its regulations in assessing requests for fee waivers, followed by an explanation of Florida Environmental Nonprofit Organizations’ satisfaction of those requirements. *See* 6 C.F.R. § 5.11(k).³ Fee waiver requests must be evaluated based on the face of the request. *See Citizens for Responsibility & Ethics in Wash. v. U.S. Dep’t of Justice*, 602 F. Supp. 2d 121, 125 (D.D.C. 2009).

- (1) The subject of the request: Whether the subject of the requested records concerns the operations or activities of the government. The subject of the requested records must concern identifiable operations or activities of the Federal government, with a connection that is direct and clear, not remote or attenuated.**

The requested records relate to EPA’s oversight of its delegation of the federal NPDES permit program to the State of Florida, including the specific oversight of the State of Florida’s permit issuance and modifications processes for consistency with NPDES regulations and the

² Pursuant to FOIA, 5 U.S.C. § 552(a)(4)(A)(iv), no fee may be charged for the first two hours of search time or for the first one hundred pages of duplication.

³ *See also Department of Justice Fee Waiver Guidance to Agency Heads From Stephan Markman, Assistant Att’y Gen.* (Apr. 2, 1987) (advising agencies of factors to consider when construing fee waivers), available at http://www.justice.gov/oip/foia_updates/Vol_VIII_1/viii1page2.htm.

Final 2009 Reasonable Assurance Addendum: Allocation Assessment Report, January 22, 2010 approved by FDEP on December 22, 2010, which specifically addresses the federally-recognized Total Maximum Daily Load (“TMDL”) for Total Nitrogen for Tampa Bay. Further, the requested records relate to EPA’s review, if any, of consent orders between the State of Florida and individual dischargers in response to violations of an NPDES permit and the Clean Water Act, such as the City of Largo (who has been under a Consent Order with the State of Florida for 14 years with six (6) amendments and remains in noncompliance with the Clean Water Act). The subject matter of the requested records directly and specifically concerns identifiable operations or activities of the federal government, with a connection that is direct and clear, not remote.

The Department of Justice Freedom of Information Act Guide expressly concedes that “in most cases records possessed by federal agency will meet this threshold” of identifiable operations or activities of the government. *See* Department of Justice Guide to the FOIA (2009), p. 25. This requirement is clearly met in this case.

- (2) The informative value of the information to be disclosed: Whether the disclosure is likely to contribute to an understanding of government operations or activities. The disclosable portions of the requested records must be meaningfully informative about government operations or activities in order to be likely to contribute to an increased public understanding of those operations or activities. The disclosure of information that already is in the public domain, in either a duplicative or a substantially identical form, would not be as likely to contribute to such understanding.**

The requested records are meaningfully informative about government operations or activities and are “likely to contribute” to an increased public understanding of those operations or activities. In 2016, the Florida Environmental Nonprofit Organizations, deeply concerned with sewage pollution from municipalities throughout the state of Florida and in particular the Gulf Coast region, launched their “Sick of Sewage” campaign. The records requested will provide the Florida Environmental Nonprofit Organizations with valuable information that may be communicated to the public who share the Organizations’ concerns about sewage pollution in Florida. Specifically, the requested records will likely contribute to the public’s understanding of: (1) EPA’s oversight of its delegation of the federal NPDES permit program to the State of Florida; (2) EPA’s participation in the NPDES permit issuance and modification process; and (3) whether EPA or FDEP have properly prioritized enforcement of NPDES permit violations and sanitary sewer overflows to prevent, limit, and monitor pollution to the waters of the United States. The Florida public is facing a crisis of sewage spills throughout the State of Florida, and has a right to know how EPA oversees the Florida delegation of its NPDES permitting authority and takes enforcement action against violators. Disclosure of the requested records will enhance the public’s knowledge of these issues and support public oversight of federal agency operations. These records will also illuminate in a clear and direct way, the operations and activities of EPA to fulfill important Congressional mandates under the Clean Water Act (“CWA”). There is a logical connection between the content of the records we have requested and the government’s operations and activities related to the restoration and maintenance of the chemical, physical, and biological integrity of the Nation’s waters.

Furthermore, the information being requested is new. The information requested is not, to our knowledge, publicly available in its entirety. The Government may omit sending us requested records that are available in publicly accessible forums such as on the internet or in published materials that are routinely available at public or university libraries so long as the Government provides us with adequate references and/or website links so that we may obtain these materials on our own. However, the requested materials will otherwise not be available unless we receive them from the Government in response to this FOIA request.

- (3) The contribution to an understanding of the subject by the public is likely to result from disclosure: Whether disclosure of the requested information will contribute to understanding of a reasonably broad audience of persons interested in the subject, as opposed to the individual understanding of the requester. A requester's expertise in the subject area and ability and intention to effectively convey information to the public will be considered.**

Disclosure of the records will promote the understanding of the general public, who frequently read about sewage spills in Florida, "Red Tide" and algal blooms, in a significant way, because Florida Environmental Nonprofit Organizations will analyze the information and make its conclusions known to our members, other environmental groups nationwide, and the public at large via press releases, newsletters, and by posting our analyses of the information on one or more internet web sites or citizen group email broadcast "systems." There has been significant media attention, at times at the national level, related to sewage pollution and nutrient overloading of Florida waters, which can exacerbate Red Tide and algal blooms, wreaking havoc to marine life and human health. The documents requested are expected to shed light on these issues. Because Florida Environmental Nonprofit Organizations have the intention to analyze these records and inform their membership and the public at large, this requirement is easily met.

The activities of publicizing and distributing information received through FOIA requests demonstrate Florida Environmental Nonprofit Organizations' intention to disseminate the information to the public with the goal of disclosing material that will inform, or has the potential to inform, the public. *See also Forest Guardians v. U.S. Dep't of the Interior*, 416 F.3d 1173, 1180 (10th Cir. 2005) (finding an online newsletter and maintenance of a website sufficient to show how the requester will disseminate information); *Federal CURE v. Lappin*, 602 F. Supp. 2d 197, 203-04 (D.D.C. 2009) (finding public interest organization's "website [and] newsletter . . . are an adequate means of disseminating information," and noting the organization's "stature as [an] advocacy group . . . len[t] credence" to its dissemination argument). Florida Environmental Nonprofit Organizations will use the information obtained through this FOIA request in the methods described herein, therefore it will contribute to "public understanding."

- (4) The significance of the contribution to public understanding: Whether the disclosure is likely to contribute significantly to public understanding of government operations or activities. The public's understanding of the subject in question prior to the disclosure must be significantly enhanced by the disclosure.**

Disclosure of the requested information will significantly contribute to public understanding of government operations. Specifically, the information will demonstrate whether and to what extent EPA has properly exercised oversight of its delegation of the federal NPDES Permit program to FDEP, including review of individual permit modifications that may violate NPDES regulations. The requesting parties have an interest in the Tampa Bay Total Maximum Daily Load (“TMDL”) process and are deeply concerned when State permitting and consent order processes appear to contravene the TMDL process.

EPA’s activities related to the State of Florida permit delegation could have a significant impact on critical waters of the United States. Florida Environmental Nonprofit Organizations have a demonstrated ability to disseminate the problematic features of government activities to a wider public audience, by litigation as well as the other means. Factors indicating an ability to disseminate information to the public include publication on an organization website and the ability to obtain media coverage. *Judicial Watch v. Rossotti*, No. 02-5154, 2003 WL 2003805 (D.C. Cir. May 2, 2003).

Florida Environmental Nonprofit Organizations analyses will be disseminated via press releases as well as posted on the respective websites and social media platforms of the Florida Environmental Nonprofit Organizations and likely the web sites of other environmental groups. Florida Environmental Nonprofits Organizations have a proven track record of obtaining press coverage of the environmental issues it publicizes, and are widely seen as reliable informational resources for press and other organizations focused on environmental issues in the region. For example, Suncoast Waterkeeper engages in radio broadcasts, and also participates in advisory committees, stakeholder meetings, and numerous collaborations with environmental organizations. Through these and other means, Suncoast Waterkeeper will disseminate its analysis of the requested information. Similarly, OCE maintains an active education bank on its website, a bank of relevant press coverage, and informative press releases of its successful campaigns and accomplishments.

(5) The existence and magnitude of a commercial interest: Whether the requester has a commercial interest that would be furthered by the requested disclosure.

Florida Environmental Nonprofit Organizations are community-based educational nonprofit corporations committed to the protection, preservation, and restoration of the environment.

Suncoast Waterkeeper (“SCWK”) is a non-profit public benefit corporation with members throughout Southwest Florida, including Pinellas County, dedicated to protecting and restoring the Florida Suncoast’s waterways through fieldwork, advocacy, environmental education, and enforcement for the benefit of the communities that rely upon these precious coastal resources. SCWK has been registered as a not for profit corporation in Florida since 2012 and has maintained its good and current standing in Florida since that time. SCWK is a licensed member of Waterkeeper Alliance, Inc., an international non-profit environmental organization, made up of over 300 separate Waterkeeper programs, such as Suncoast Waterkeeper.

Our Children's Earth Foundation ("OCE") is a non-profit corporation based in Florida and California dedicated to protecting the environment. OCE promotes public awareness of domestic and international environmental impacts through information dissemination, education, and private enforcement of environmental protection statutes. OCE enforcement cases aim to achieve public access to government information, ensure proper implementation of environmental statutes and permitting, and enjoin violations of environmental and government transparency laws. OCE has an active membership of people from all over the United States with a significant portion of its members residing in the Tampa Bay Area and throughout South Florida. More information on OCE's governmental accountability and transparency work, including past FOIA actions, is available at <https://www.ocefoundation.org/programs/government>.

Tampa Bay Waterkeeper ("TBWK") is a non-profit public benefit corporation with members throughout the Tampa Bay watershed. Based in Pinellas County, Tampa Bay Waterkeeper is dedicated to protecting and improving the Tampa Bay watershed while ensuring swimmable, drinkable and fishable water for all. Tampa Bay Waterkeeper's approach combines sound science, policy advocacy, grassroots community engagement and education to stand up for clean water together as a community, ensuring a clean and vibrant future for the Tampa Bay watershed. TBWK has been registered as a not for profit corporation in Florida since 2017 and has maintained its good and current standing in Florida since that time. TBWK is a licensed member of Waterkeeper Alliance, Inc., an international non-profit environmental organization, made up of over 300 separate Waterkeeper programs, such as Tampa Bay Waterkeeper.

Accordingly, Florida Environmental Nonprofit Organizations have no commercial interest in the information requested. Florida Environmental Nonprofit Organizations seek the information solely to determine the oversight provided by EPA regarding FDEP's delegation to manage the federal NPDES permit program, and to determine whether EPA's oversight has resulted in individual modifications that may violate NPDES regulations. EPA's oversight has serious implications for the restoration and maintenance of the waters of the United States. This information will therefore aid in Florida Environmental Nonprofit Organizations' efforts to advocate that the appropriate state, federal, or private entities take needed actions to protect our environment.

Florida Environmental Nonprofit Organizations have no financial interest in the information sought or any enforcement actions that may result. Florida Environmental Nonprofit Organizations' goal in urging enforcement of environmental laws is not private financial gain, but rather vindication of the larger public interest in ensuring that EPA is operating in such a way that it will protect, and contribute to the protection of public health, wildlife, and the environment.

- (6) The primary interest in disclosure: Whether any identified commercial interest of the requester is sufficiently large, in comparison with the public interest in disclosure, that disclosure is primarily in the commercial interest of the requester.**

Florida Environmental Nonprofit Organizations have no commercial interest in the requested information, as discussed above. Accordingly, the identified public interest in the disclosure of the requested information discussed above necessarily outweighs any commercial interest in this request. For the above reasons, Florida Environmental Nonprofit Organizations respectfully request a fee waiver pursuant to 5 U.S.C. § 552(a)(4)(A)(iii) and 7 C.F.R. § 5.11 for all copying costs, mailing costs, and other costs related to locating and tendering the documents.

In the event that your Agency denies Florida Environmental Nonprofit Organizations a fee waiver, please send a written explanation for the denial along with a cost estimate. Please contact us for authorization before incurring any costs in excess of \$25.

I look forward to your determination on this FOIA request within twenty days, as required by FOIA. 5 U.S.C. § 552(a)(6)(A)(i). The twenty-day statutory deadline is also applicable to Organizations' fee waiver request. *See, e.g., Judicial Watch, Inc. v. Rossotti*, 326 F.3d 1309, 1310 (D.C. Cir. 2003) (finding where an agency "fails to answer the [fee waiver] request within twenty days," judicial review is appropriate).

Please direct all correspondence and responsive records to:

Justin Bloom, Attorney at Law, PA
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Sarasota, FL 34230
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Fax: (866) 574-2169
E-mail: bloomesq1@gmail.com

Thank you for your attention to this request. If you have any questions about the requested records or the requested fee waiver, please do not hesitate to contact me at the phone or email below. In particular, I am happy to discuss ways in which we can narrow the request to be less cumbersome.

Sincerely,

A handwritten signature in blue ink, appearing to read "Justin Bloom", with a stylized flourish extending to the right.

Founder and Member of the Board
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